


Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

DECEMBER 11 20 14

WILLIAM M. McCOOL, Clerk

By  Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JALEEL TARIQ ABDUL-JABBAAR,

Defendant.

**CR 14 NO 0358 RSL**

INDICTMENT

**COUNT 1**

**(Interstate Threats)**

On or about September 15, 2014, at Seattle, within the Western District of Washington, and elsewhere, JALEEL TARIQ ABDUL-JABBAAR knowingly and willfully transmitted in interstate and foreign commerce, from the State of Washington to another state, a communication, that is, a public Facebook posting, that contained a threat to injure D.W., specifically, a posting containing D.W.'s name and photograph and the message: "This dude needs his house sprayed."

All in violation of Title 18, United States Code, Section 875(c).

INDICTMENT/ABDUL-JABBAAR - 1

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**COUNT 2**

**(Interstate Threats)**

On or about October 27, 2014, at Seattle, within the Western District of Washington, and elsewhere, JALEEL TARIQ ABDUL-JABBAAR knowingly and willfully transmitted in interstate and foreign commerce, from the State of Washington to another state, a communication, that is, a public Facebook posting, that contained a threat to injure D.W., specifically, a posting containing D.W.'s name and the message: "We the oppressed people need to kill this white cop."

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 3**

**(Interstate Threats)**

On or about November 11, 2014, at Seattle, within the Western District of Washington, and elsewhere, JALEEL TARIQ ABDUL-JABBAAR knowingly and willfully transmitted in interstate and foreign commerce, from the State of Washington to another state, a communication, that is, a public Facebook posting, that contained a threat to injure D.W. and D.W.'s family members, specifically, a posting containing the message: "Are there any REAL BLACK MEN that would love to go down to Ferguson Missouri to give back those bullets that Police Officer [D.W.] fired into the body of Mike Brown. If we're unable to locate Officer [D.W.] then We'll return them to his wife and if not her then his children."

All in violation of Title 18, United States Code, Section 875(c).

**COUNT 4**

**(Interstate Threats)**

On or about November 24, 2014, at Seattle, within the Western District of Washington, and elsewhere, JALEEL TARIQ ABDUL-JABBAAR knowingly and willfully transmitted in interstate and foreign commerce, from the State of Washington to another state, a communication, that is, a public Facebook posting, that contained a threat

1 to injure D.W., specifically, a posting containing D.W.'s name and photograph and the  
2 message: "Ready to go and kill some cops."

3 All in violation of Title 18, United States Code, Section 875(c).

4 **COUNT 5**

5 **(Interstate Threats)**

6 On or about November 24, 2014, at Seattle, within the Western District of  
7 Washington, and elsewhere, JALEEL TARIQ ABDUL-JABBAAR knowingly and  
8 willfully transmitted in interstate and foreign commerce, from the State of Washington to  
9 another state, a communication, that is, a public Facebook posting, that contained a threat  
10 to injure D.W., specifically, a posting containing a news report about D.W. and the  
11 message: "We need to kill this white motha fucka and anything that has a badge on."

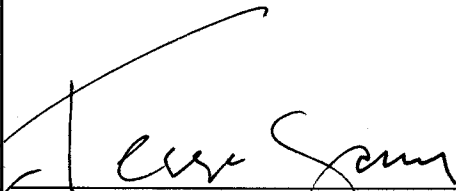
12 All in violation of Title 18, United States Code, Section 875(c).

13 A TRUE BILL:

14 DATED: ~~10-12-14~~ 12-10-14

15 *Signature of foreperson redacted*  
16 *pursuant to the policy of the Judicial*  
17 *Conference of the United States*

18 FOREPERSON

19  
20   
21 ANNETTE L. HAYES  
22 Acting United States Attorney

23  
24   
25 TODD GREENBERG  
26 Assistant United States Attorney

27  
28 INDICTMENT/ABDUL-JABBAAR - 3

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